

j\_crenshaw Comments.txt  
From: Julie Crenshaw Van Fleet [solarcosmos@prontomail.com]  
Sent: Monday, November 19, 2007 6:22 PM  
To: Darton, Terry

Hi Terry,  
Attached are my comments on the SOP.  
Appreciate your diligence.

Regards,  
julie

19 November 2007

Comments via email from Julie Crenshaw Van Fleet on a state operating permit for the Potomac River Generating Station owned and operated by Mirant LLC in Alexandria, Virginia.

The opportunity for comment is most appreciated. To begin, the Potomac River Generating Station (PRGS) must be installed with best available control technologies (BACT). The PRGS plant is an antiquated one dating back to the late 1940s. Its continued operation was not included in its construction plans. To do less is like running a jalopy without a catalytic converter.

Continuous emissions monitoring (CEM) is essential for the pollutants SO<sub>2</sub>, NO<sub>x</sub>, Hg, PM<sub>2.5</sub>, HCL, HF, and CO. I continue to ask that both thorium and uranium be measured. Aren't you curious if either of those are present? All of this data, in real time, should be made available as readily readable formats on the Internet.

PM<sub>2.5</sub> needs to be measured and modeled - not PM<sub>10</sub> as a surrogate. Currently PM<sub>2.5</sub> is being both measured and modeled for the upcoming Virginia State Implementation Plan due in 2008 to EPA. There is no longer a reason to use PM<sub>10</sub> as a surrogate.

Any permit for a generating facility such as the PRGS needs to use the new PM<sub>2.5</sub> ceiling of 35micrograms/cubic centimeter. If the PRGS cannot meet the new standard then the facility must be designated as a "hotspot" and operate at a reduced capacity or be closed. For all pollutants, facility wide emissions limits should be lower than that prior to 2005 when the PRGS was shut down. They, as any facility, should strive for continued reductions of all pollutants.

Inspections and testing mentioned as at "reasonable times," being regular business hours or when the plant is operational is ambiguous. Given the sordid history of the PRGS it should be

treated as subject to inspection and testing like a delinquent. Don't mince words, be direct and say that Inspections and Testing may occur At Any Time that an office under the Secretary of Natural Resources or the Air Pollution Control Board (APCB) wishes to investigate the functions of the PRGS. Persons have gone to sleep at night and found construction projects on the PRGS premises the next morning.

Do records of malfunctions corroborate the same sightings of malfunctions and violations by the residents? Some accountability is necessary as local residents have noticed questionable occurrences at the PRGS.

Exceedances of ambient air quality standards must make PRGS subject to the APCB. The APCB should always have the authority to direct the PRGS to reduce their level of operations and/or to shut down the facility, and, the plant remain shut down until it can no longer violate ambient air quality standards.

At this time the evaluation of the PRGS under New Source Review (NSR) has not happened. It is imperative that there is an understanding and definitive decision as to whether the PRGS is in violation of NSR. How can a permit for anything be given without this important determination?

The PRGS control equipments' performance is of importance as a Reasonable Available Control Technology is capable of a performance level different than that of a BACT. Under any scenario the limitations should be the same - not may pollute more because of a technology. BACT should make their compliance easier. With the profits that Mirant has been receiving, which is their only reason to operate as they themselves have said, they have the funds to purchase the best available.

The use of Trona or other sodium bicarbonate substance to reduce the emissions of SO<sub>2</sub> must not be allowed unless, UNLESS the chemical reactions of Trona or other sodium bicarbonate substance are shown to have no byproducts such as increased PM<sub>2.5</sub> or some lessening of quality of life such as coughs, burning eyes, respiratory

and cardiovascular problems, or damage to property. It is reckless endangerment to ignore the use of a substance without examining it's effects. Test it on laboratory mice before people, don't ya think?

It would be less work for Virginia staff and others concerned about the PRGS to include both CAIR and CAMR now, unless you are planning to wait to issue a permit or you plan to reopen an existing permit in 2008 to include PM2.5.

The planning for how to manage the PRGS needs close study. Permitting the PRGS is too complicated and it could be streamlined, at least it could be if Mirant stopped suing the Department of Environmental Quality every time they are told to straighten up and fly right.

The bottom line is that there must be transparency from Mirant. Transparency that meets the standards the public expects from any corporate neighbor so that they do not become anxious over its functions.

My thanks.